

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

v.)	CIVIL ACTION NUMBER
ANN MITCHELL,)	04-cv-12169-REK
Plaintiff,)	JULY 2004
)	SUSPENDED
HALLMARK HEALTH SYSTEM, INC./)	DISMISSED
LAWRENCE MEMORIAL HOSPITAL)	
and JULIE CHASE SHAUGHNESSY,)	
Defendants.)	
)	

JOINT STATEMENT

Pursuant to Fed. R. Civ. P. 16(b) and (c), Local Rule 16.1 and the Court's October 21, 2004 Notice of Scheduling Conference, the parties hereby respectfully submit their Joint Statement.

I. PROPOSED AGENDA FOR SCHEDULING CONFERENCE

- A. Status of Motions to Dismiss and to Amend Complaint
- B. Parties' Proposed Pretrial Schedule
- C. Status of Settlement Discussions

II. PARTIES' PROPOSED PRETRIAL SCHEDULE

A. Motion to Amend Complaint Granted	Immediately
B. Motion to Dismiss Amended Complaint Filed	December 31, 2004
C. Opposition to Motion to Dismiss Filed	January 31, 2005
D. Hearing on Motion to Dismiss	c. February, 2005
E. Initial Disclosures Served	March 1, 2005

F.	Fact Discovery Complete	September 1, 2005
G.	At Court's and Parties' Discretion, Attendance At Settlement Conference	c. October, 2005
H.	Motions for Summary Judgment Filed	October, 1, 2005
I.	Opposition to Summary Judgment Motions Filed	November 1, 2005
J.	Expert Witness Reports Filed (if necessary)	Within 30 days of Court's summary judgment decision
K.	Expert Discovery Complete (if necessary)	Within 30 days of date expert witness Reports due

III. TRIAL BY MAGISTRATE JUDGE

The parties do not agree to a trial before a Magistrate Judge.

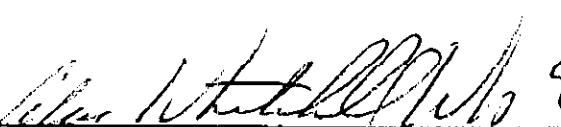
IV. CERTIFICATIONS

Signed certifications, in accordance with Local Rule 16.1(D)(3), will be filed on behalf of the parties at or before the Scheduling Conference.

Respectfully submitted,

ANN MITCHELL

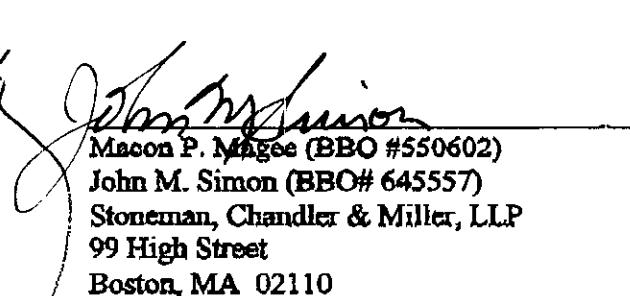
By her attorney,


Alice Whitehill Wiseberg
(BBO# 568027)
65A Atlantic Avenue
Boston, MA 02110
(617) 304-3848

Dated: November 24, 2004

HALLMARK HEALTH SYSTEM, INC./
LAWRENCE MEMORIAL HOSPITAL
and JULIE CHASE SHAUGHNESSY

By their attorneys,


Macon P. Magee (BBO #550602)
John M. Simon (BBO# 645557)
Stoneman, Chandler & Miller, LLP
99 High Street
Boston, MA 02110
(617) 542-5789

Certificate of Service

I hereby certify that a true copy of the above document was served upon the attorney of record for each other party by mail () on 11-24-04.

